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6 Attorney for Plaintiff,

7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 Schakina Hunt

10 Plaintiff,

12 vs.

13 Account Control Technology, Inc.; and
14 DOES 1-10, inclusive,

15 Defendants.

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18 For this Complaint, the Plaintiff, Schakina Hunt, by undersigned counsel,
19 states as follows:

20 **INTRODUCTION**

22 1. This is an action for actual and statutory damages brought by Plaintiff,
23 Schakina Hunt, an individual consumer, against Defendant, Account Control
24 Technology, Inc., for violations of the Fair Debt Collection Practices Act, 15
25 U.S.C. § 1692 *et seq.* (hereinafter “FDCPA”), which prohibits debt collectors
26 from engaging in abusive, deceptive, and unfair practices.

ORIGINAL

COMPLAINT FOR DAMAGES

JURISDICTION

2. Jurisdiction of this court arises under 15 U.S.C. § 1692k(d) and 28
3 U.S.C. § 1337. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and
5 2202. Venue in this District is proper in that the Defendant transacts business here.

PARTIES

3. Plaintiff, Schakina Hunt, is a natural person with a permanent
9 residence in Charlotte, Mecklenburg County, North Carolina, 28215.

4. Upon information and belief the Defendant, Account Control
11 Technology, Inc., is a corporation engaged in the business of collecting debt in
12 this state and in several other states, with its principal place of business in this
13 District located at 6918 Owensmouth Ave, Canoga Park, Los Angeles County,
14 California, 91303. The principal purpose of Defendant is the collection of debts in
15 this state and several other states, and Defendant regularly attempts to collect debts
16 alleged to be due another.

5. Defendant is engaged in the collection of debts from consumers using
21 the mail and telephone. Defendant regularly attempts to collect consumer debts
22 alleged to be due to another. Defendant is a “debt collector” as defined by the
23 FDCPA, 15 U.S.C. § 1692a(6).

FACTUAL ALLEGATIONS

6. Upon information and belief, Defendant began placing collection calls
to Plaintiff in May of 2011.

7. The debt Defendant is attempting to collect on is an alleged obligation
of a consumer to pay money arising out of a transaction in which the money,
property, insurance or services which are the subject of the transaction are
primarily for personal, family, or household purposes, whether or not such
obligation has been reduced to judgment.

8. Within one (1) year preceding the date of this Complaint, Defendant,
in connection with the collection of the alleged debt, stated to Plaintiff that she
could not consolidate her loans and that her only option was the Defendant's
rehabilitation program.

9. Plaintiff is consolidating her loans, including the alleged debt.

10. The representations made to Plaintiff by Defendant regarding
consolidation were false.

11. The natural consequence of Defendant's statements was to produce an
unpleasant and/or hostile situation between Defendant and Plaintiff.

12. The natural consequence of Defendant's statements was to cause
Plaintiff mental distress.

PRAYER FOR RELIEF

13. Plaintiff repeats and realleges and incorporates by reference to the
14 foregoing paragraphs.

15. Defendants violated the FDCPA. Defendants' violations include, but
16 are not limited to, the following:

17 (a) Defendant violated §1692d of the FDCPA by engaging in conduct
18 the natural consequences of which is to harass, oppress, or abuse
19 any person in connection with the collection of an alleged debt;
20 and

21 (b) Defendant violated §1692e of the FDCPA by using a false,
22 deceptive, or misleading representation or means in connection
23 with the collection of the alleged debt; and

24 (c) Defendant violated §1692e(10) of the FDCPA by using false
25 representation or deceptive means in connection with the collection
26 the alleged debt; and

27 (d) Defendant violated §1692f of the FDCPA by using unfair or
28 unconscionable means in connection with the collection of an
alleged debt.

15. Defendant's acts as described above were done intentionally with the
16 purpose of coercing Plaintiff to pay the alleged debt.

17. As a result of the foregoing violations of the FDCPA, Defendant is
18 liable to the Plaintiff, Schakina Hunt, for declaratory judgment that Defendant's
19 conduct violated the FDCPA, actual damages, statutory damages, and costs and
20 attorney fees.

1 WHEREFORE, Plaintiff respectfully requests that judgment be entered
2 against Defendant, Account Control Technology, Inc., for the following:
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4 A. Declaratory judgment that Defendant's conduct violated the
5 FDCPA.
6 B. Actual damages.
7 C. Statutory damages pursuant to 15 U.S.C. § 1692k.
8 D. Costs and reasonable attorney fees pursuant to 15 U.S.C. §
9 1692k.
10 E. Awarding Plaintiff any pre-judgment and post-judgment
11 interest as may be allowed under the law.
12 F. For such other and further relief as the Court may deem just and
13 proper.

14 **DEMAND FOR JURY TRIAL**
15

16 PLEASE TAKE NOTICE that Plaintiff, SCHAKINA HUNT, demands trial
17 by jury in this action.

18 DATED: August 10, 2011

19 LARA SHAPIRO

20 By: Lara Shapiro / LSP
21 Lara R. Shapiro

22 Attorney for Plaintiff
23 Schakina Hunt
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